

AO 91 (rev.11/11) Criminal Complaint

AUTHORIZED AND APPROVED DATE:

United States District Court

for the

WESTERN DISTRICT OF OKLAHOMA

United States of America

v.

Busayo Opeyemi Adeosun

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Case No: M-21-582-STE

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about March 20, 2020, within the Western District of Oklahoma and elsewhere, the defendant, Busayo Adeosun, violated

Count 1

Code Section

Offense Description

18 U.S.C. § 1543

Passport Fraud

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Andrew Harris, Federal Bureau of Investigation, which is incorporated and made a part hereof by reference.

☐ Continued on the attached sheet.



Complainant's signature

ANDREW HARRIS

Special Agent

Federal Bureau of Investigation

Sworn to before me and signed in my presence.

Date: **Oct 6, 2021**

City and State: Oklahoma City, Oklahoma



Judge's signature

SHON T. ERWIN, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Andrew B. Harris, being duly sworn, does depose and state the following:

AGENT BACKGROUND AND INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been employed by the FBI since 2014. In my capacity as an FBI Special Agent, I have personally investigated or assisted in investigating criminal matters involving computer intrusion, fraud, money laundering, and related offenses. Based on my training and experience as an FBI Special Agent, I am familiar with the means and methods that criminals use to defraud victims. I have also become knowledgeable about the criminal statutes of the United States, particularly the statutes relating to computer intrusion (18 U.S.C. §1030), conspiracy (18 U.S.C. §371), wire fraud (18 U.S.C. § 1343), money laundering (18 U.S.C. §§ 1956 and 1957), mail fraud (18 U.S.C. § 1341), bank fraud (18 U.S.C. § 1344) and passport fraud (18 U.S.C. § 1543). I am authorized to obtain and execute federal arrest, search and seizure warrants.

PROBABLE CAUSE

2. The statements contained in this Affidavit are based in part on information provided by other agencies, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that **Busayo Adeosun**, hereinafter referred to as **Busayo**, committed the below-described offense, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part.

The following is true to the best of my knowledge and belief:

3. As will be shown below, there is probable cause to believe that **Busayo** committed Passport Fraud, a violation of Title 18, United States Code, Section 1543, which occurred within the Western District of Oklahoma.

4. VENUE: The facts and circumstances alleged in this affidavit occurred in Oklahoma City, Oklahoma and Edmond, Oklahoma, within the Western District of Oklahoma.

5. OFFENSE: On or about March 20, 2020, **Busayo**, committed the offense of passport fraud, a violation of Title 18, United States Code, Sections 18 U.S.C. § 1543.

6. BACKGROUND: On May 14, 2020, Abdul Waris Akinsanya, was arrested by Tulsa Police Department (TPD). Akinsanya entered City National Bank at 207 S. Memorial Dr. and indicated his name was Lake Hunter. Akinsanya inquired about the Hunter account with the teller. The teller of the bank noticed that the account was negative \$19,000 and stalled until the police arrived.

7. According to the TPD report, officers arrived on scene and interviewed Akinsanya. Akinsanya admitted his real name was Akinsanya. Numerous passports and Driver's Licenses were in Akinsanya's possession, all containing Akinsanya's picture. Akinsanya possessed a United Kingdom passport purportedly issued in the name of Mike Kelvin Cobbs with a date of birth November 6, 1992, with a picture of Akinsanya wearing a grey sport coat and pink shirt. Akinsanya possessed a United Kingdom passport purportedly issued in the name of Gavin Colin Apex with a date of birth of May 12, 1990, with a picture of Akinsanya wearing a dark suit and tie. Various additional identification documents were seized from Akinsanya in the names of Lake Dean Hunter, John Timothy Baxter, Gavin Colin Apex, Mike Kelvin Cobbs.

8. Utility documents in the names of Baxter, Apex, and Cobbs, were located and seized by TPD. An Oklahoma Department of Wildlife Conservation fishing license in the name of Lake Dean Hunter was also located and seized by TPD. Credit cards in the names of Oliver

Jack, Randy Fornari, Mike Wilz Smith and Billy M Woods were also located and seized. A bank statement from Bank of America in the name of Apex was located and seized. Additionally, a JP Morgan Chase bank statement in the name of Cobbs was located and seized by TPD.

9. Akinsanya was subsequently interviewed by TPD and admitted to working with an individual in Houston, Texas, by the name of Busayo. Akinsanya stated that he sent his picture and \$350 dollars to Busayo and received fake passports and identification documents in order to fraudulently open bank accounts. Once Akinsanya received money into the accounts, he withdrew the funds and sent them back to Busayo. Akinsanya stated that he was waiting for a \$19,000 wire transfer into his account. Once he received the wire, he was going to keep 10% of the money and withdraw the rest and mail it to Busayo. Akinsanya stated that he was involved in the fraud because he was trying to pay his college tuition. Akinsanya stated there were a few different individuals involved in the same fraud.

10. Review of Akinsanya's iPhone which was seized at the time of his arrest indicated that he had numerous conversations regarding fraud with Busayo through WhatsApp. Akinsanya's phone contains contact information for a contact listed as "Busayo Houston" with a phone number and WhatsApp account number ending in 5567. Open source records searches indicate that the number ending in 5567 is assigned to Busayo Opeyemi Adeosun with a birth year of 1985. On or about March 13, 2020, Busayo sent Akinsanya a WhatsApp message identifying himself as "Adeosun Busayo" and provided Akinsanya with a bank account number for an account at United Bank for Africa.

11. On or about March 20, 2020, Busayo messaged Akinsanya and asked him, "How many oju you wan do." Based upon my training and experience, I know that the word "aju" is Yoruba and is translated as "face". This is likely translated to mean "identification" or "passport." Akinsanya responded to Busayo that he wanted, "8" and Busayo asked what Country

he wanted. Akinsanya stated, "I want that UK bro." Busayo asked Akinsanya to send his info. Akinsanya sent a list of eight names to include Baxter John Timothy, Conley James Thomas, Dietz Jared Francis, Moore Dean Stephan, Combs Mike Brady, George Finn George, Apex Gavin Colin, and Cobbs Mike Kelvin. Busayo asked Akinsanya for a date of birth and a date to stamp on it for entry access. Akinsanya provided date of birth of October 10, 1990, a photo of himself and entry access of 2018 for Busayo. Akinsanya provided the name of Billy Woods and addresses in Oklahoma City and Edmond, Oklahoma for the pickup. Busayo subsequently sent Akinsanya a photo of what appeared to be one of the fake passports and a photo of fake United Kingdom Driver's License for John Timothy Baxter. The Driver's License contained Akinsanya's photo on it.

12. I obtained records from Bank of America showing that on or about May 13, 2020, a checking account was opened at Bank of America in the name of Gavin Apex. Statements associated with the signature card indicated Apex maintained address of 500 N Blackwelder Ave Apt 54. Open source search of aforementioned apartment indicated that Akinsanya was a resident of the apartment at the time of the account opening.

CONCLUSION

13. Based on a review of this case, and based on my knowledge and experience, I, as your Affiant have probable cause to believe that **Busayo Adeosun** committed the offense Passport Fraud, a violation of Title 18, United States Code, Sections 1543, in the Western District of Oklahoma.

Respectfully Submitted,



Andrew B. Harris
Special Agent, FBI

Sworn before me this 6th day of October 2021.



SHON T. ERWIN
UNITED STATES MAGISTRATE JUDGE
WESTERN DISTRICT OF OKLAHOMA